

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C., 20554

In re:)
)
Inquiry Regarding Carrier) ET Docket No.
03-104
Current Systems, including)
Power Line Broadband Systems)
)

To: The Commission

Comments on Behalf of Douglas T. Smith Editorial Services

I make the following comments on ET docket no. 03-104 on behalf of Douglas T. Smith Editorial Services, of which I am sole proprietor. I edit a major Amateur Radio magazine, design radio equipment and stay active in both commercial and Amateur Radio.

WHEREAS:

1. Amateur Radio is a singular national resource, providing much-needed emergency communications in times of distress,
2. Amateur Radio is a major force in bringing along technically educated communicators,
3. Amateur Radio contributes greatly to the state of the art in radio communications,
4. Amateur Radio promotes international goodwill through direct person-to-person contact; and

FURTHERMORE:

5. Broadband-over-power-line (BPL) communications pose a significant threat to such endeavors because of mutual interference possibilities.

6. Such interference would certainly occur, since power lines are not designed to carry radio-frequency (RF) energy and coupling among licensed Amateur Radio transmitters, receivers and the power lines is inevitable.

7. Such coupling is also inevitable for other licensed Services and for governmental radio operations that are critical to our national security.

8. The Commission has previously commented on the incompatibility of radio transmitters in the low-frequency (LF) range and power-line communications.

9. Radio astronomy in the HF and VHF ranges might be rendered implausible because of adoption of higher limits on conducted and radiated power-line emissions.

10. The viability of BPL is seriously in question also on economic terms because coaxial cable and amplifiers seem to be less expensive per mile than BPL. Wireless broadband data communications in the microwave bands may be even less expensive and the Commission has endorsed that, authorizing many MHz of spectrum for it.

And FINALLY:

11. The Commission could consider *what* is being communicated rather than *how much*. Congress has prohibited "spam" facsimile transmissions; the Commission would do the citizens of the United States a service by ruling against unwanted e-mails. With respect, that is what we expect of you: our appointed regulators.

In CONCLUSION:

1. The Commission would do well to study and consider the magnitude and scope of mutual interference that would be caused by BPL.

2. I believe you would conclude, as I have, that any proposal for BPL must protect licensed radio users-- as you have promised to do. We shall work with you to keep that promise.

3. Do something about communications content instead of volume. In my opinion, it is the biggest issue in communications today.

Respectfully yours,

Douglas T. Smith, KF6DX
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